

**BEFORE THE  
POSTAL RATE COMMISSION**

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**POSTAL RATE AND FEE CHANGES, 2001**


**DOCKET NO. R2001-1**

**INTERROGATORY OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS SCHERER  
(UPS/USPS-T30-1 through 3)  
(November 1, 2001)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby  
files and serves the following interrogatory directed to United States Postal Service

Witness Scherer: UPS/USPS-T30-1 through 3.

Respectfully submitted,

  
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John E. McKeever  
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Attorneys for United Parcel Service

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INTERROGATORIES OF UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS SCHERER

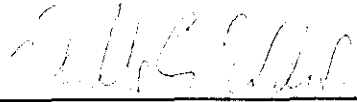
UPS/USPS-T30-1: Are there ZIP Code pair delivery standards for Priority Mail for each ZIP Code to which Priority Mail is delivered? If not, for what portion of ZIP Code pairs are there delivery standards?

UPS/USPS-T30-2: Since the Commission's Opinion in Docket No. R2000-1, has the Postal Service changed any ZIP Code pair delivery standards for Priority Mail? If so, provide the proportion of the changed pairs to the total number of all Priority Mail ZIP Code pairs for which delivery standards were upgraded (providing for a shorter delivery time) and for which delivery standards were downgraded (providing for a longer delivery time).

UPS/USPS-T30-3: Are the delivery standards for Priority Mail different under the FedEx transportation contract? If so, provide the proportion of the changed pairs to the total number of all Priority Mail ZIP Code pairs for which delivery standards have been or will be upgraded (providing for a shorter delivery time) and for which delivery standards have been or will be downgraded (providing for a longer delivery time).

CERTIFICATE OF SERVICE

I hereby certify that on this date I have caused to be served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.



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Phillip E. Wilson, Jr.

Dated: November 1, 2001  
Philadelphia, PA

90105